

La traducción y/o la clarificación española serán dados si hay solicitud. Llame por favor Nayyer Mahdi (251) 574-5086

**MOBILE COUNTY**  
**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the  
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange ([www.hudhre.info](http://www.hudhre.info)). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

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The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

*Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.*

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

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Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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**A. General Information**

<b>Grantee Name</b>	Mobile County, Alabama
<b>Name of Entity or Department Administering Funds</b>	Mobile County Commission Grants Department
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Nayyer Mahdi
<b>Title</b>	Director of Grants Management
<b>Address Line 1</b>	205 Government Street
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Mobile, AL 36644-1800
<b>Telephone</b>	251.574.5086
<b>Fax</b>	251.574.5080
<b>Email Address</b>	nmahdi@mobile-county.net
<b>Authorized Official</b> (if different from Contact Person)	Mike Dean
<b>Title</b>	President, Mobile County Commission
<b>Address Line 1</b>	205 Government Street
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Mobile, AL 36644-1800
<b>Telephone</b>	251.574.3000
<b>Fax</b>	251.574.5080
<b>Email Address</b>	<a href="mailto:district3web@mobile-county.net">district3web@mobile-county.net</a>
<b>Web Address where this Form is Posted</b>	<a href="http://www.mobilecountyal.gov">www.mobilecountyal.gov</a>

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$ 586,571</b>
<b>Amount Grantee is Requesting</b>	<b>\$ 586,571</b>

\*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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**B. Citizen Participation and Public Comment**

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response:

The Mobile County Grants Department accesses and manages HUD funds. In anticipation of the HUD HPRP Notice on March 19, 2009, representatives of that office met with key staff of the CoC lead organization, Housing First, Inc., to plan for the submission process. On March 28, a notice was published in the Mobile Press Register and posted online on Mobile County's website to announce a Public Hearing on the ARRA HPRP on April 9 at 6:00 p.m.

On April 7, the CoC held an open meeting to review HPRP elements and prepare membership organizations for participating in the funding process. At the County April 9 Public Hearing, the elements of HPRP were presented and discussion followed.

The Substantial Amendment to the Consolidated Plan 2008 Action Plan was posted on the website [www.mobilecountyal.gov](http://www.mobilecountyal.gov) on April 28 and published in the Mobile Press Register on April 29. A 12-day comment period, which ends at 9:00 a.m. on May 11, 2009, is required before the Mobile County Commission adopts the Substantial Amendment to the 2008 Action Plan and submits it to HUD. Comments or suggestions concerning this Substantial Amendment to the 2008 Action Plan should be made in writing to Mr. John Pafenbach, County Administrator, Mobile County Commission, P. O. Box 1443, Mobile, AL 36633.

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:
  - ☐ Grantee did not receive public comments.
  - ☐ Grantee received and accepted all public comments.
  - ☐ Grantee received public comments and did not accept one or more of the comments.
3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Response:

Not available until May 11, 2009.

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### **C. Distribution and Administration of Funds**

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select sub-grantees. Note that a sub-grantee is defined as the organization to which the grantee provides HPRP funds.

☐ Competitive Process

☐ Formula Allocation

☒ Other (Specify: Combined non-competitive and competitive process)

2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response:

The Mobile County HPRP plan includes a non-competitive sub-grantee agreement with Housing First, Inc., the CoC lead organization. Housing First will manage the RFP competitive process and execute sub-recipient agreements for organizations selected for client activities.

Housing First has substantial experience as a HUD SHP grantee and sub-grantee for local HUD funds. Housing First operates the jurisdictional Homeless Management Information System (HMIS) and manages permanent and transitional housing projects. A non-competitive sub-grantee contract for Housing First would be for HMIS data collection & reporting, a HPRP clearinghouse and a housing location service operated in conjunction with HMIS. To streamline the process for financial management and disbursement of HPRP funds, Housing First would provide financial management services including the disbursement of funds for financial assistance, housing placement and housing stability activities provided by sub-recipient organizations and authorized third-party vendors.

Housing First would extend sub-recipient agreements to established organizations for HPRP activities that would involve direct contact with the individuals and families seeking and obtaining financial assistance, housing placement and housing stability services. An RFP for sub-recipient applications would be published. A review committee with representation for the CoC board of directors would make recommendations to the Mobile County Commission regarding the suitability and capacities of sub-recipient applicants. The Mobile County Commission would select the sub-recipient organizations and authorize Housing First to execute sub-recipient

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contracts. A start-up workshop for sub-recipients would be held. A media release announcing the County HPRP would occur. All HPRP funds would be allocated by September 30, 2009.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to sub-grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

Upon HUD approval of the Substantial Amendment to the 2008 Action Plan, Mobile County Commission would proceed with the sub-grantee agreement with Housing First to create the structure and process required for HMIS, the clearinghouse for clients served, the housing location service and the capacity for financial management of HPRP funds.

The sub-recipient organizations that would provide direct client services and activities for homeless prevention, rapid re-housing and housing stability would be selected based on the recommendations of the applicant review committee and approval by the Mobile County Commission.

A HPRP start-up workshop would be held for all sub-recipient organizations. A media release announcing the County HPRP would occur. The sub-recipient agreements would be in place so that all HPRP funds would be allocated and encumbered for HPRP eligible uses by September 30, 2009.

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its sub-grantees (limit 500 words).

Response:

Mobile County is responsible for monitoring all HPRP activities, including activities carried out by sub-grantee, Housing First, and their sub-recipients established by the Notice and any subsequent guidance. The County will utilize a variety of contractual, financial, reporting and monitoring controls, in combination with outcome/performance measures, to ensure prompt and proper use of HPRP funds in accordance with the Notice.

Requirements:

a. Detailed Project Agreement(s):

Mobile County will include procedures in the sub-grantee agreement that will stipulate detailed responsibilities for the County and the sub-grantee. The sub-grantee sub-recipient agreements will stipulate detailed responsibilities of sub-grantee and the sub-recipients.

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Agreements include but not limited to:

designation of contract managers; funding limitations/restrictions; eligibility thresholds/documentation requirements; allowable types, conditions, ranges of assistance; stipulate assistance cannot be made to the client; maximum levels of assistance per occurrence/family by type of assistance; case management consultation and client case review/update requirements; preparation of a housing stability plan; rental occupancy requirements; client tracking and follow-up/outcome reporting standards; HMIS integration/related reporting requirements; financial accountability/expenditure eligibility; requirements for payment authorization from HPRP funds; auditable expenditure tracking, drawdown/supporting documentation; no duplicate HPRP payments for clients or for assistance provided from other resources; opportunity for budgeting and credit counseling; documentation of discharge policy; reporting requirements.

### **b. Expenditure Tracking, Fund Drawdown, Monthly Reporting:**

All expenditures reported to the County in detail by the sub-grantee on a monthly basis. All expenditures are to be fully documented and clearly associated with eligible activities. County will drawdown start-up fund advance to be used by sub-grantee to pay invoices submitted by the sub-recipients for payment to third party (i.e., rent, utilities, etc.). Further drawdowns replenish the depleted advance.

### **c. Client/Beneficiary Tracking and Reporting:**

All clients will be individually tracked, reported and documented by sub-recipients by HMIS data entry no later than the second day following service activity to ensure an up-to-date status for the clearinghouse component of HMIS to prevent duplications/fraud.

### **d. Routine Meetings with Sub-recipient Staff:**

The sub-grantee will meet with sub-recipients monthly for the initial 3 months of implementation then quarterly thereafter.

### **e. Remote Monitoring:**

County will monitor sub-grantee and sub-recipients through monthly reports and drawdown requests provided by the sub-grantee to ensure compliance with the guidelines and the respective agreements as well as program progress.

### **f. On-Site Monitoring:**

The first on-site review will be before the drawdown to replenish the start-up advance is approved. After the initial on-site review, County will monitor the sub-grantee on a semi-annual basis to ensure compliance and to ensure that the quality of services is delivered by the sub-grantee and sub-recipients. Following each monitoring visit, a letter will be sent to the sub-grantee recapitulating the visit. If in compliance with the regulations, it will be reflected in the letter. If not in compliance, the letter will include recommendations to bring them into full compliance.

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The sub-grantee will monitor sub-recipients twice during the initial 12 months then annually for the balance of program. Should problems arise, frequency will be increased until issues are resolved, reported and approved by County.

### **D. Collaboration**

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Response:

The Mobile County Commission has a long-standing working relationship with the sub-grantee Housing First, Inc. that includes working with federal and state agencies involved in the delivery of supportive or specialized services for citizens in need. Coordination for homeless and at-risk citizens is encouraged through a comprehensive CoC network that involves all known and active service providers in the community. This network is posted on the Housing First website [www.housingfirst-al.org](http://www.housingfirst-al.org). A separate HPRP network will be posted on that website for linkage to all organizations that will have access to ARRA resources that could be of benefit to homeless or at-risk citizens.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response:

Mobile County has an annual performance contract with the sub-grantee Housing First, Inc. to conduct CoC activities required on its behalf. CoC activities include maximizing the use of mainstream resources and coordinated discharged planning geared to preventing homelessness. There is a CoC checklist of all mainstream and community resources for homeless and at-risk citizens. Service providers are encouraged to use the checklist to ensure all resources have been accessed. The checklist includes TANF, Medicaid, Social Security, SSI and SSDI, Food Stamps, Veterans benefits, AllKids SCHIP, Unemployment Compensation, and Job Training/Employment. Discharge planning relationships are in place with agencies responsible for public foster care, health care, mental health and corrections.

The existing community and mainstream resource checklist will be expanded to include the HPRP resources. Sub-recipient organizations will be contractually required to document referrals to mainstream and community resources as a component of the case plan and case closure. This documentation will be included in Monthly Reports provided by sub-recipient organizations.



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3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response:

The *Mobile County Consolidated Plan 2005* has a strong emphasis on the importance of ensuring continuing availability of affordable housing for households with broad ranges of income levels and varied needs. Under the Plan, a high priority is placed on activities that will support or enable households to remain in affordable housing including rental housing or that would foster access to affordable housing. *Consolidated Plan* priorities address housing needs for homeowners, renters, the homeless or near homeless, and those with special needs. There is focus on preserving affordable housing opportunities for low and moderate-income families.

The *Mobile County Consolidated Plan 2005* states that the Consortium sees the priorities related to homeless activities as: assisting service providers to more efficiently deliver the services needed by the homeless population and undertaking activities to aid in the prevention of homelessness. As such, the *Consolidated Plan* is fully compatible with the mission and purposes of HPRP.

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### E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

<b>HPRP Estimated Budget Summary</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re- housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$ 207,942	\$ 144,000	\$ 351,942
Housing Relocation and Stabilization Services <sup>2</sup>	\$ 70,389	\$ 105,582	\$ 175,971
<b>Subtotal</b> (add previous two rows)	<b>\$ 278,331</b>	<b>\$ 249,582</b>	<b>\$ 527,913</b>

  

Data Collection and Evaluation <sup>3</sup>	\$ 29,329
Administration (up to 5% of allocation)	\$ 29,329
<b>Total HPRP Amount Budgeted<sup>4</sup></b>	<b>\$ 586,571</b>

<sup>1</sup>Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

<sup>2</sup>Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

<sup>3</sup>Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

<sup>4</sup>This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

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**F. Authorized Signature**

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

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Signature/Authorized Official

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Date

President, Mobile County Commission  
Title